Pasquale

Serial No.: 10/710,085 Filed: June 17, 2004 Page: 11 of 14

REMARKS

In response to the non-final office action of May 1, 2006, applicants ask that all claims be allowed in view of the amendment to the claims and the following remarks.

Claims 1-3, 5-12, 15, 17-19, and 21-22 are now pending with claims 1 and 11 being independent. Claims 4, 13, 14, 16, and 20 have been cancelled, claims 1-3, 5-12, 15, and 17-19 have been amended to correct minor errors, and claims 21 and 22 have been added. No new matter has been introduced. Support for the newly added claims may be found in the specification at, for example, page 5, line 4 to page 6, line 1.

Specification

The Office Action indicates that grammatical, idiomatic, and spelling or other minor errors in the disclosure should be corrected. See Office Action of May 1, 2006 at page 2, lines 1-3. Accordingly, the specification has been amended to address the examiner's concerns. Applicants note that the changes now proposed cite to page and line numbers corresponding to the version of the application available from the Patent Application Information Retrieval ("PAIR") website.

Claim Rejections Under § 102(b)

Claims 1-8, 10-17, and 20 stand rejected under § 102(b) as being anticipated by United States Patent Number 6,311,137 ("Kurokami"). Applicants' cancellation of claims 4, 13, 14, 16, and 20 renders the rejection of those claims as anticipated by Kurokami moot. Applicants request reconsideration and withdrawal of the rejection of claims 1-3, 5-8, 10-12, 15, 17, and 19 because Kurokami does not describe or suggest the subject matter of amended independent claims 1 and 11, as described more fully below.

As amended, independent claim 1 recites an AC electricity supply system that includes a plurality of DC power sources and a plurality of inverters. Each inverter is connected to a corresponding DC power source and is configured to convert DC electricity from the

Pasquale

Serial No.: 10/710,085 Filed: June 17, 2004 Page: 12 of 14

corresponding DC power source into AC electricity. The AC electricity supply system also includes a power line connecting each of the plurality of inverters to an AC load for providing AC electricity from the plurality of inverters to the AC load and a controller that is operatively coupled to each of the plurality of inverters by a communications bus. The controller is configured to measure a power consumption of the AC load and, based on the measured power consumption of the AC load, activate an appropriate number of inverters.

Kurokami describes a photovoltaic power generation system that includes a plurality of independently operating inverters for converting DC currents generated by a plurality of solar cell strings into AC currents that can be outputted to a commercial power system. See Kurokami at Abstract and col. 1, lines 10-30. In addition, the photovoltaic generation system includes a control circuit that receives information about the amount of power output by the inverters and that transmits the information to one or more display units. See Kurokami at col. 2, lines 45-58 and col. 9, lines 58-64.

Notably, however, the control circuit of Kurokami does not control and/or activate the inverters. Rather, the control circuit merely "outputs data to be outputted to the display units 32a to 32c to output connectors 35a to 35c, based on the received data on the amounts of power generation." Kurokami at col. 9, lines 60-63. As such, Kurokami does not describe or suggest a controller that is configured to measure a power consumption of an AC load and, based on the measured power consumption of the AC load, activate an appropriate number of inverters, as recited in independent claim 1. Accordingly, for at least this reason, applicants request reconsideration and withdrawal of independent claim 1 and its dependent claims 2, 3, 5-8, and 10.

As amended, independent claim 11 recites a method for providing AC electricity to an AC load. The method includes measuring a power consumption of the AC load, wherein power is provided to the AC load from a plurality of inverters. Each of the plurality of inverters is connected to a corresponding DC power source and is configured to convert DC electricity from the corresponding DC power source into AC electricity. The method also includes determining

Pasquale

Serial No.: 10/710,085 Filed: June 17, 2004 Page: 13 of 14

an appropriate number of inverters to activate based on the measured power consumption and activating the appropriate number of inverters.

As discussed above, Kurokami's control circuit does not control and/or activate the inverters of the photovoltaic power generation system described in Kurokami. As such, Kurokami does not describe or suggest determining an appropriate number of inverters to activate, and activating the appropriate number of inverters, as recited in independent claim 11. Accordingly, for at least this reason, applicants request reconsideration and withdrawal of the rejection of independent claim 11 and its dependent claims 12, 15, 17, and 19.

Claim Rejection Under § 103(a)

Claims 9 and 18, each of which depends from one of independent claims 1 or 11, stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kurokami in view of United States Patent Number 5,031,088 ("Tanaka"). Applicants request reconsideration and withdrawal of the rejection of claims 9 and 18 because Tanaka does not remedy the failure of Kurokami to describe or suggest the subject matter of independent claims 1 and 11.

Tanaka generally describes a variable voltage and variable frequency electric power converter. See Tanaka at col. 1, lines 7-10. More particularly, Tanaka is applied by the Office Action for disclosing a capacitor that serves as a DC power source. See Office Action of May 1, 2006 at page 3, lines 12-13 and Tanaka at FIG. 1. As such, applicants note that Tanaka is not applied by the Office Action to cure the deficiencies in Kurokami described above with respect to independent claims 1 and 11 and submit that Tanaka does not cure these deficiencies. Accordingly, for at least this reason, applicants request reconsideration and withdrawal of the rejection of claims 9 and 18.

New Claims

New claims 21 and 22 depend directly from independent claims 1 and 11 respectively. Therefore, because of their dependencies and the reasons noted above with respect to independent claims 1 and 11, applicants submit that newly added claims 21 and 22 are allowable.

Pasquale

Serial No. : 10/710,085 Filed : June 17, 2004 Page : 14 of 14

Conclusion

It is believed that all of the pending issues have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this reply should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this reply, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicants submit that all claims are in condition for allowance.

The fee in the amount of \$225 in payment of the Petition for Extension of Time fee is being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: October 2, 2006

Andrew T. Foy Reg. No. 57,333

Fish & Richardson P.C. 1425 K Street, N.W. 11th Floor Washington, DC 20005-3500 Telephone: (202) 783-5070

Facsimile: (202) 783-2331

40360524.doc